

BEFORE THE COMMISSION - COMMENTS on RM-10867  
Proposal for Amateur Radio Restructuring from ARRL

Dear Sirs:

As a licensed Radio Amateur since 1965, and an instructor for new amateur licensing classes, I believe that the proposal from the ARRL would provide Amateur Radio with a strong license structure that would serve us very well in both the near and long term.

New Entry Level License

I've had a number of young teens and pre-teens express interest and enthusiasm for Amateur Radio. However, that interest quickly dissipates when they are presented with the study guide for the Technician Class license. The younger people are not scared of studying the basics needed to be an Amateur. But the idea of having to study a question pool of over 500 questions seems very overwhelming to them.

Historically, the Technician license was not intended as the entry level. The Novice license was very popular. However, waning interest in Morse Code led to the introduction of the codeless Technician license, and eventually, nearly all new applicants were skipping the Novice in favor of the 'easier' Technician. At this point, however, we also saw some fundamental shifts in demographics. Fewer young people joined the hobby. There are many complex reasons behind this, but the workload required to earn the Technician was probably a big part of it, though that was not widely recognized at the time.

Introduction of a new entry level license will ease the entry into the hobby for all newcomers, but particularly for younger ones. It would be very desirable to see an increase in the number of young amateurs to provide for the long term stability of the service.

Merging Licenses

Merging of the Technician and General classes is the most controversial part of this otherwise very well accepted proposal.

I can understand the concern that Technicians have not studied the material pertinent to HF operations. However, it has been my recent experience that in practice, the content of Element 3 is not that much greater than that of Element 2, in fact, looking at the real question pool, it would seem that Element 2 contains the bulk of the learning effort. In the last year, I have had nine people take Element 2 and then Element 3. Of those, 7 came within three correct answers of passing Element 3 with no additional study beyond that for Element 2. Two passed Element 3. One applicant got a perfect score. He had read the Element 3 questions. The other applicant had studied only the General Class band edge questions, and some questions on rectifiers. He got 33 of 35 correct.

Clearly, for some period of time, there has been little difference between Element 2 and Element 3, and historically, they were originally the same. So, there is really little reason for concern. The amount of effort needed to master the Technician material is very substantial. Indeed, my review of Element 3 shows that the biggest difference is that much of the material from the old Advanced Class exam I took in the late 1960's is now on Element 3. So, Element 2 and 3 combined cover a wider range of topics than the General exam did in the 1960's.

I am less impressed with the proposal to upgrade Advanced to Extra Class. However, if we are to have the goal of three license classes, then this is the fairest resolution. The Advanced license in many cases does represent a significant achievement beyond the General level. There are still many hams who were licensed prior to World War II and currently hold the Advanced license. Upgrading them to Extra restores priveleges they enjoyed prior to 1968.

#### Novice Band Redeployment

The ARRL proposal fairly divides the existing Novice frequencies for use by all amateurs. These bands have been mostly unused since the Novice license faded from favor. Redistributing them will encourage better utilization of our HF spectrum.

#### Conclusion

I support the ARRL proposal in its entirety, and ask the Commission to expedite adoption of this proposal. The Amateur community has been embroiled in the controversy over license restructuring for several years now. The controversy has not helped the service. Accelerated adoption of this proposal will help to restore the spirit of Amateur Radio.

Sincerely,

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